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February 16, 2002

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C 20445

Re: *Digital Audio Broadcasting Systems and Their Impact on the Terrestrial  
Broadcast Service*  
MM Docket No. 99-325

Dear Mr. Caton:

On behalf of KMAT radio station of who I am the licensee, I respectfully submit these comments in response to the Commission's December 19, 2001 Public Notice in the above-referenced proceeding. In its Public Notice, the Commission requested comment on the National Radio Systems Committee's ("NRSC") recent evaluation of iBiquity Digital Corporation's ("iBiquity") FM IBOC system and the results of iBiquity's FM system tests. These submissions by the NRSC and iBiquity establish a record at the FCC demonstrating the need for digital audio broadcasting and the value iBiquity's IBOC system will bring to the U.S. listening public. I strongly encourage the Commission to promptly endorse IBOC and the iBiquity system as the best means of implementing terrestrial digital audio broadcasting in the United States.

The NRSC report and the iBiquity test results indicate numerous additional benefits of IBOC technology. I know that the new auxiliary data features that IBOC will allow broadcasters to offer a range of new data services that will greatly benefit my listeners, as well as the public overall. Current FM broadcast radio services play a unique role in our society, reaching an extremely high percentage of the population on a regular basis. The IBOC system will allow these new data services to be offered to the widest possible range of end users. Although these new data services will be developed and improved over time, I believe prompt introduction of IBOC will help foster this development.

The iBiquity test report demonstrates that the FM IBOC system meets all the evaluation criteria for digital audio broadcasting the Commission has established. The NRSC report independently confirms iBiquity's conclusions. The NRSC found that the iBiquity system provides an opportunity for broadcasters to upgrade their analog systems by offering better sound quality. The proposed iBiquity system helps relieve multipath interference, thus allowing broadcasters to reach more listeners within their service areas that currently lack quality analog reception. The NRSC also found that these benefits can be achieved without harming existing analog operations of either the station adopting the digital broadcast or adjacent channel stations.

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I encourage the Commission to move forward. The Commission should clarify that it is no longer pursuing an out-of-band solution for terrestrial digital radio. iBiquity's demonstration of the viability and benefits of IBOC eliminate the need for examination of alternative approaches. The Commission should categorically endorse IBOC as the specific solution for terrestrial digital radio and the iBiquity system. Finally, the Commission should formally adopt the IBOC standard and require broadcasters, receiver manufacturers and consumers to upgrade to digital. This should include proposing rules that enable the introduction of IBOC at the earliest possible date.

Respectfully submitted,

William E. Cordell  
Licensee of KMAT-FM